

Rick Hernandez
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Attorney for Jorge Ballesteros

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,)	
)	NO. 4:22-CR-06021-SAB-1
Plaintiff,)	
)	MOTION AND
vs.)	DECLARATION TO
)	CONTINUE PRE-TRIAL
JORGE BALLESTEROS,)	AND TRIAL DATES
)	
)	With Oral Argument
)	October 19, 2022
Defendant.)	10:30 a.m., Yakima, WA.

COMES NOW the Defendant, Jorge Ballesteros, by and through his attorney of record, Ricardo Hernandez, and moves this court for an order continuing the Pre-Trial Hearing date set for October 19, 2022 @ 10:30 a.m. and Jury Trial Hearing date set for October 31, 2022 @9:00 a.m.

This motion is based upon the court file in the instant case, and the accompanying declaration of counsel.

DATED this 28th day of September 2022.

s/ Ricardo Hernandez
Ricardo Hernandez

RICARDO HERNANDEZ, being first duly sworn upon oath, deposes and

States as follows:

1. I am the attorney of record for the defendant Jorge Ballesteros in the above matter.
2. The current Pre-Trial Hearing date set for October 19, 2022 @ 10:30 a.m. and Jury Trial Hearing date set for October 31, 2022 @9:00 a.m.
3. Defense counsel needs additional time to review discovery with client.
4. For the reasons stated, defense counsel would request a continuance of the current Pre-Trial hearing and trial date.

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Dated this 28th day of September 2022.

s/ Ricardo Hernandez
Ricardo Hernandez

I hereby certify that on September 28, 2022 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Caitlin A Baunsgard**, Assistant U.S. Attorney.

s/ Ricardo Hernandez
Ricardo Hernandez